

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SUNCO TIMBER (KUNSHAN) CO., LTD.,

Plaintiff,

vs.

LINDA SUN, *et al.*,

Defendants

Civ. A. No. 22-10833-ADB

**MOTION OF LINDA SUN TO  
DISMISS COUNTS 4, 5, 8, 9, 10, AND 11**

The defendant, Linda Sun, moves for dismissal of counts 4, 5, 8, 9, 10, and 11 of the complaint for failure to state a claim on which relief can be granted. A memorandum of law accompanies this motion. Mrs. Sun also joins in the motion to dismiss filed by the other defendants today.

**REQUEST FOR ORAL ARGUMENT**

The defendant requests oral argument on this motion.

Respectfully submitted,

LINDA SUN

By her attorney:

*/s/ Theodore J. Folkman*

Theodore J. Folkman (BBO No. 647642)  
FOLKMAN LLC  
53 State St., Suite 500  
Boston, MA 02109  
(617) 219-9664  
[ted@folkman.law](mailto:ted@folkman.law)

Dated: August 1, 2022

LOCAL RULE 7.1 CERTIFICATE

I certify that I have conferred with counsel for the plaintiff and attempted in good faith to resolve or narrow the issues presented in this motion.

*/s/ Theodore J. Folkman*